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July 28, 2022

Via ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Garcia Luna* 19 Cr. 576 (BMC)

Dear Judge Cogan,

We write to respectfully request that the Court appoint Florian Miedel, Esq. to assist in representing Mr. Garcia Luna in this matter. At the July 15, 2022 status conference, the Court indicated that it would authorize the appointment of additional CJA counsel to assist in representing Mr. Garcia Luna. The defense has spoken with Mr. Miedel, an experienced member of this Court's CJA panel, and he is willing to assist in the matter and join the defense team. Based on the vast amount of discovery already turned over, and the close to ten thousand pages of § 3500 material that the government has not yet disclosed, we agree with the Court that additional counsel is necessary.

As the Court understands, it will take some time for Mr. Miedel to get up to speed with this complex matter. That process and his current trial schedule, make him unavailable for the October 2022 trial date. However, Mr. Miedel would be available to try this case on the backup date scheduled by the Court in January 2023.

For the foregoing reasons, we respectfully request that the Court appoint Mr. Miedel at the CJA rate of \$158 an hour to assist in representing Mr. Garcia Luna in this matter. If the Court grants our request, we expect that Mr. Miedel will seek the appointment of an additional paralegal, who will assist in facilitating Mr. Miedel's discovery review.

Respectfully submitted,

/s/

César de Castro
Valerie Gotlib
Shannon McManus